

12/23/08

E-19J

Mr. James J. Steele
Division Administrator
Federal Highway Administration – Michigan Division
315 W. Allegan, Room 201
Lansing, Michigan 48933

RE: Comments on the Final Environmental Impact Statement (FEIS) for the Detroit River International Crossing (DRIC), Wayne County, Michigan, EIS No. 20080488

Dear Mr. Steele:

I am providing comments on the Final Environmental Impact Statement (EIS) for the Detroit River International Crossing (DRIC), consistent with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The United States Environmental Protection Agency - Region 5 (EPA) has worked with the Federal Highway Administration (FHWA) and the Michigan Department of Transportation (MDOT) on this project as a cooperating agency since 2005. We provided our input throughout the process, concurring on the milestones as described in the Interagency Streamlining Agreement for the DRIC. Our letter on the Draft EIS on May 14, 2008, provided comments on air quality (particulate matter and mobile source air toxics), mitigation for those impacts, stormwater, energy efficiency, and sustainability of the plaza.

Our comments have been addressed and appropriate mitigation has been proposed in the Final EIS. We understand that the measures proposed by FHWA, as stated in Ryan Rizzo's email message on December 4, 2008, will be included in the Record of Decision (ROD). Those measures include design, operational, construction, and enhancement measures (summarized below) that could be taken to minimize air quality impacts:

Design

- A) Selected alternative will allow trucks to use access roads to I-75 instead of neighborhood roads.
- B) Circulation on the plaza will minimize the time vehicles, especially trucks, need to traverse through the plaza.
- C) Landscaping will be considered to aid in improving air quality along the roadways.
- D) The storm water retention area on the plaza close to Southwest High School will buffer plaza operations from the school.

Upgraded Operations

- A) An increase in the number of Gamma Ray Inspection Technology (GRIT) lanes will reduce truck queuing and idling.
- B) An increase in trucking companies enrolling in NEXUS and FAST and additional lanes will streamline traffic flow.
- C) Customs and Border Patrol (CBP) standard operating procedures requiring trucks to turn off their engines while being inspected will be used.

Construction Measures

- A) Construction operations will follow best operational practices (i.e., engine shut down to reduce idling, loading operations away from sensitive receptors) to reduce any impact of diesel emissions.
- B) MDOT will work with contractors on an operational agreement to control construction air pollution. A construction emissions plan may include actions such as: retrofitting off-road construction equipment; limiting the age of off-road vehicles; minimizing engine operations; restricting activities around certain more-sensitive receptors, using diesel particulate traps and oxidation catalysts; and, using existing power sources or clean fuel generators, rather than temporary power generators.

Long Term Air Quality Enhancement

MDOT will work with the Southeast Michigan Council of Governments (SEMCOG), the Michigan Department of Environmental Quality (MDEQ), the private sector and the community to create a community enhancement action plan comprised of projects addressing air quality. MDOT will work with its partners to identify short-term and long-term objectives aimed at reducing PM_{2.5} emissions in the study area. MDOT, working with their partners, will commit to engage in a process to prioritize air quality improvement projects implemented during design and construction phases (Year 2011), and sustained through the maintenance and operation of the facilities. The projects will be focused on actions that address fugitive dust, diesel truck idling, fuel consumption, and diesel emissions to limit PM_{2.5} emissions in the study area. The actual projects are not known at this time, as they will be developed through working with the community and the other partners. The action plan will identify priorities for future federal-aid-eligible transportation projects through programs such as Congestion Management and Air Quality (CMAQ) and the Midwest Clean Diesel Initiative. Activities could also include outreach activities to inform businesses and residents on air pollution control strategies.

Provided that FHWA and MDOT commit to these measures in the ROD, we have no objections to the project.

If you have any questions on our comments, please contact me at (312) 886-3000. Your staff is welcome to contact Sherry Kamke at (312) 353-5794 or kamke.sherry@epa.gov or Ken Westlake at (312) 886-2910 or westlake.kenneth@epa.gov.

Sincerely,

/s/ Gary Gulezian for

Lynn Buhl
Regional Administrator

Enclosure

cc: Robert Parsons, Michigan Department of Transportation
David Wresinski, Michigan Department of Transportation
David Williams, FHWA